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July 15, 2025

VIA ECF

Honorable Justin T. Quinn, U.S.M.J.
U.S. District Court, District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: John Doe v. Princeton University,
Civil Case No. 3:22-cv-05887-RK-JTQ

Dear Judge Quinn:

Plaintiff John Doe's July 14 letter (ECF 106) misrepresents Princeton's position. The parties agree that a summary judgment briefing schedule should be set, and both intend to move for judgment in their favor on the lone remaining contract claim. However, Princeton did not agree to the six-brief schedule plaintiff says "the parties have agreed upon[.]" ECF 106. Rather, to reduce the burden on the parties and the Court, Princeton proposes a four-brief schedule under which it would file a combined response to Plaintiff's summary judgment motion and cross-motion for summary judgment, with subsequent briefs similarly combined:

- Plaintiff's Motion for Summary Judgment: Thursday, August 28th.
- Princeton's Cross-Motion for Summary Judgment/Response: Wednesday, October 8th.
- Plaintiff's Opposition to Princeton's Motion/Reply: Friday, November 7th.
- Princeton's Reply in Support of its MSJ: Tuesday, November 25.

A streamlined, four-brief schedule makes sense here and is far more efficient than simultaneous briefing on the one remaining claim. Plaintiff bears the burden of proof and the parties are well aware of each other's view of the case after extensive discovery. Their opening briefs likely would cover much of the same ground, as would their responses and replies. Princeton's four-brief proposal seeks to reduce these redundancies, minimizing the burden on the parties and the Court.

Plaintiff knew Princeton intended to propose a four-brief schedule from the parties' correspondence, yet misrepresented Princeton's position as agreement with its six-brief proposal, going so far as to caption its filing as "Agreed Upon." It is not. While Princeton conveyed it

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agreed to the dates in Plaintiff's letter *if a six-brief schedule is the format the Court prefers*, Princeton was clear that it sought a staggered, four-brief schedule so that the parties can avoid redundancy and there are fewer briefs the Court must read. And Princeton's proposal would not delay resolution of the case; briefing could still conclude in November 2025.

For these reasons, Princeton respectfully requests that the Court enter the above proposed four-brief streamlined summary judgment schedule.

Respectfully submitted,

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